RETURN DATE: JANUARY 3, 2017

SUPERIOR COURT

J.D. OF NEW HAVEN

RUBEN NEGRON, LUISA NEGRON, : YAMIL ALEXANDER NEGRON-GONZALEZ PPA RUBEN NEGRON, SAMUEL NEGRON-: GONZALEZ PPA RUBEN NEGRON AND RUBEN

AT NEW HAVEN

NEGRON III PPA RUBEN NEGRON

NOVEMBER 30, 2016

VS.

CHURCH STREET NEW HAVEN LLC, CINQUE GREEN LIMITED PARTNERSHIP, NORTHLAND INVESTMENT CORPORATION AND NORTHLAND FUND II LIMITED PARTNERSHIP

COMPLAINT

COUNT ONE: (Ruben Negron as to Church Street New Haven LLC; negligence)

- 1. In and/or prior to September 17, 2015 the defendant, Church Street New Haven LLC, owned, managed, possessed and/or controlled one or more buildings located at or in the vicinity of 34 Cinque Green in New Haven (hereinafter the "premises").
- 2. At all relevant times, the defendant invited members of the public, including its tenants and their guests, to enter upon the premises.
- 3. It was the duty of the defendant to exercise care to maintain the premises in a reasonably safe condition for members of the public lawfully therein, including the plaintiff.

- 4. Prior to September 17, 2015, the plaintiff, Ruben Negron, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5. The circumstances were caused by the carelessness and negligence of the defendant in one or more of the following ways:
 - a. It caused, allowed and/or permitted the air in the Apartment to be toxic and/or unhealthy and, therefore, dangerous to breathe and/or inhale;
 - b. It maintained the Apartment in the aforesaid dangerous condition;
 - c. It failed to warn of the dangerous condition;
 - d. It, either directly or through its agents and/or employees, created the unsafe condition;
 - e. It failed, either directly or through its agents and/or employees, to properly maintain the Apartment so that it would be safe for use as a dwelling;
 - f. It failed to have in place an effective inspection and/or maintenance system so as to timely be aware of and address unsafe, defective and/or dangerous conditions in the Apartment and/or the premises;

- g. It failed to properly hire, train and/or supervise maintenance personnel to adequately inspect and/or maintain the Apartment and/or the premises;
- h. It failed to properly and/or timely clean and/or operate the heating and cooling ducts in the Apartment and/or the premises;
- i. It failed to properly and/or timely clean and/or dry out wet areas in the Apartment and/or the premises; and
- j. It otherwise failed to exercise due care in maintaining the premises.
- 6. As a result of the circumstances, the plaintiff was forced to suffer the following injuries, some or all of which may be permanent in nature:
 - a. Mold overexposure and/or poisoning;
 - b. Respiratory system damage;
 - c. Lung damage;
 - d. Asthma;
 - e. Inadequate oxygenation;
 - f. Throat injury; and
 - g. Emotional distress.

- 7. As a result of the circumstances and resultant injuries, the plaintiff has been forced to suffer and will continue to suffer pain and a loss of his enjoyment of life's leisure activities.
- 8. As a further result of the circumstances and resultant injuries, the plaintiff was forced to expend money for medical care and may be obliged in the future to expend further sums for such purposes.

COUNT TWO: (Luisa Negron as to Church Street New Haven LLC; negligence)

- 1-3. Paragraphs 1-3 of Count One are hereby realleged as paragraphs 1-3 of Count Two.
- 4. Prior to September 17, 2015, the plaintiff, Luisa Negron, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where she was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing her to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Two.

COUNT THREE: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Church Street New Haven LLC; negligence)

- 1-3. Paragraphs 1-3 of Count One are hereby realleged as paragraphs 1-3 of Count Three.
- 4. Prior to September 17, 2015, the plaintiff, Yamil Alexander Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Three.

COUNT FOUR: (Samuel Negron-Gonzalez ppa Ruben Negron as to Church Street New Haven LLC; negligence)

- 1-3. Paragraphs 1-3 of Count One are hereby realleged as paragraphs 1-3 of Count Four.
- 4. Prior to September 17, 2015, the plaintiff, Samuel Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of

toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.

5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Four.

COUNT FIVE: (Ruben Negron III ppa Ruben Negron as to Church Street New Haven LLC; negligence)

- 1-3. Paragraphs 1-3 of Count One are hereby realleged as paragraphs 1-3 of Count Five.
- 4. Prior to September 17, 2015, the plaintiff, Ruben Negron III, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Five.

COUNT SIX: (Ruben Negron as to Cinque Green Limited Partnership; negligence)

- 1. In and/or prior to September 17, 2015 the defendant, Cinque Green Limited Partnership, owned, managed, possessed and/or controlled one or more buildings located at or in the vicinity of 34 Cinque Green in New Haven (hereinafter the "premises").
- 2-8. Paragraphs 2-8 of Count One are hereby realleged as paragraphs 2-8 of Count Six.

COUNT SEVEN: (Luisa Negron as to Cinque Green Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Six are hereby realleged as paragraphs 1-3 of Count Seven.
- 4. Prior to September 17, 2015, the plaintiff, Luisa Negron, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where she was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing her to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Seven.

COUNT EIGHT: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Cinque Green Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Six are hereby realleged as paragraphs 1-3 of Count Eight.
- 4. Prior to September 17, 2015, the plaintiff, Yamil Alexander Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Eight.

COUNT NINE: (Samuel Negron-Gonzalez ppa Ruben Negron as to Cinque Green Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Six are hereby realleged as paragraphs 1-3 of Count Nine.
- 4. Prior to September 17, 2015, the plaintiff, Samuel Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of

toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.

5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Nine.

COUNT TEN: (Ruben Negron III ppa Ruben Negron as to Cinque Green Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Six are hereby realleged as paragraphs 1-3 of Count Ten.
- 4. Prior to September 17, 2015, the plaintiff, Ruben Negron III, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Ten.

COUNT ELEVEN: (Ruben Negron as to Northland Investment Corporation; negligence)

1. In and/or prior to September 17, 2015 the defendant, Northland Investment Corporation, owned, managed, possessed and/or controlled one or more buildings

located at or in the vicinity of 34 Cinque Green in New Haven (hereinafter the "premises").

2-8. Paragraphs 2-8 of Count One are hereby realleged as paragraphs 2-8 of Count Eleven.

COUNT TWELVE: (Luisa Negron as to Northland Investment Corporation; negligence)

- 1-3. Paragraphs 1-3 of Count Eleven are hereby realleged as paragraphs 1-3 of Count Twelve.
- 4. Prior to September 17, 2015, the plaintiff, Luisa Negron, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where she was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing her to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Twelve.

COUNT THIRTEEN: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Northland Investment Corporation; negligence)

1-3. Paragraphs 1-3 of Count Eleven are hereby realleged as paragraphs 1-3 of Count Thirteen.

- 4. Prior to September 17, 2015, the plaintiff, Yamil Alexander Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Thirteen.

COUNT FOURTEEN: (Samuel Negron-Gonzalez ppa Ruben Negron as to Northland Investment Corporation; negligence)

- 1-3. Paragraphs 1-3 of Count Eleven are hereby realleged as paragraphs 1-3 of Count Fourteen.
- 4. Prior to September 17, 2015, the plaintiff, Samuel Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Fourteen.

COUNT FIFTEEN: (Ruben Negron III ppa Ruben Negron as to Northland Investment Corporation; negligence)

- 1-3. Paragraphs 1-3 of Count Six are hereby realleged as paragraphs 1-3 of Count Fifteen.
- 4. Prior to September 17, 2015, the plaintiff, Ruben Negron III, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Fifteen.

COUNT SIXTEEN: (Ruben Negron as to Northland Fund II Limited Partnership; negligence)

- 1. In and/or prior to September 17, 2015 the defendant, Northland Fund II Limited Partnership, owned, managed, possessed and/or controlled one or more buildings located at or in the vicinity of 34 Cinque Green in New Haven (hereinafter the "premises").
- 2-8. Paragraphs 2-8 of Count One are hereby realleged as paragraphs 2-8 of Count Sixteen.

COUNT SEVENTEEN: (Luisa Negron as to Northland Fund II Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Sixteen are hereby realleged as paragraphs 1-3 of Count Seventeen.
- 4. Prior to September 17, 2015, the plaintiff, Luisa Negron, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where she was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing her to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Seventeen.

COUNT EIGHTEEN: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Northland Fund II Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Sixteen are hereby realleged as paragraphs 1-3 of Count Eighteen.
- 4. Prior to September 17, 2015, the plaintiff, Yamil Alexander Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large

quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.

5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Thirteen.

COUNT NINEEEN: (Samuel Negron-Gonzalez ppa Ruben Negron as to Northland Fund II Limited Partnership; negligence)

- 1-3. Paragraphs 1-3 of Count Sixteen are hereby realleged as paragraphs 1-3 of Count Nineteen.
- 4. Prior to September 17, 2015, the plaintiff, Samuel Negron-Gonzalez, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Nineteen.

COUNT TWENTY: (Ruben Negron III ppa Ruben Negron as to Northland Fund II Limited Partnership; negligence)

1-3. Paragraphs 1-3 of Count Sixteen are hereby realleged as paragraphs 1-3 of Count Twenty.

- 4. Prior to September 17, 2015, the plaintiff, Ruben Negron III, lived in an apartment located within the premises at 34 Cinque Green #15-B Christopher Green (the "Apartment") where he was caused to breathe in and/or inhale large quantities of toxic and/or unhealthy air (the "circumstances"), causing him to sustain the injuries and/or illnesses hereinafter set forth.
- 5-8. Paragraphs 5-8 of Count One are hereby realleged as paragraphs 5-8 of Count Twenty.

COUNT TWENTY-ONE: (Ruben Negron as to Church Street New Haven LLC; recklessness)

- 1-4. Paragraphs 1-4 of Count One are hereby realleged as paragraphs 1-4 of Count Twenty-One.
- 5. At all relevant times, the defendant was aware that members of the public, including small children, would be living in the Apartment and/or the premises, spending many hours per day, many days per week, many weeks per month and many months per year there, and, on information and belief, premises and parts thereof were wet and/or excessively moist and subject to the growth of mold, yet the defendant did not take action to properly clean and/or renovate the Apartment and/or the premises or otherwise assure that the air quality therein was appropriate to its intended use.

- 6. The circumstances were caused by the reckless disregard of the defendant.
- 7-9. Paragraphs 6-8 of Count One are hereby realleged as paragraphs 7-9 of Count Twenty-One.

COUNT TWENTY-TWO: (Luisa Negron as to Church Street New Haven LLC; recklessness)

- 1-4. Paragraphs 1-4 of Count Two are hereby realleged as paragraphs 1-4 of Count Twenty-Two.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Two.

COUNT TWENTY-THREE: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Church Street New Haven LLC; recklessness)

- 1-4. Paragraphs 1-4 of Count Three are hereby realleged as paragraphs 1-4 of Count Twenty-Three.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Three.

COUNT TWENTY-FOUR: (Samuel Negron-Gonzalez ppa Ruben Negron as to Church Street New Haven LLC; recklessness)

1-4. Paragraphs 1-4 of Count Four are hereby realleged as paragraphs 1-4 of Count Twenty-Four.

5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Four.

COUNT TWENTY-FIVE: (Ruben Negron III ppa Ruben Negron as to Church Street New Haven LLC; recklessness)

- 1-4. Paragraphs 1-4 of Count Five are hereby realleged as paragraphs 1-4 of Count Twenty-Five.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Five.

COUNT TWENTY-SIX: (Ruben Negron as to Cinque Green Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Six are hereby realleged as paragraphs 1-4 of Count Twenty-Six.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Six.

COUNT TWENTY-SEVEN: (Luisa Negron as to Cinque Green Limited Partnership; recklessness)

1-4. Paragraphs 1-4 of Count Seven are hereby realleged as paragraphs 1-4 of Count Twenty-Seven.

5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Seven.

COUNT TWENTY-EIGHT: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Cinque Green Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Eight are hereby realleged as paragraphs 1-4 of Count Twenty-Eight.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Eight.

COUNT TWENTY-NINE: (Samuel Negron-Gonzalez ppa Ruben Negron as to Cinque Green Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Nine are hereby realleged as paragraphs 1-4 of Count Twenty-Nine.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Twenty-Nine.

COUNT THIRTY: (Ruben Negron III ppa Ruben Negron as to Cinque Green Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Ten are hereby realleged as paragraphs 1-4 of Count Thirty.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty.

COUNT THIRTY-ONE: (Ruben Negron as to Northland Investment Corporation; recklessness)

- 1-4. Paragraphs 1-4 of Count Eleven are hereby realleged as paragraphs 1-4 of Count Thirty-One.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-One.

COUNT THIRTY-TWO: (Luisa Negron as to Northland Investment Corporation; recklessness)

- 1-4. Paragraphs 1-4 of Count Twelve are hereby realleged as paragraphs 1-4 of Count Thirty-Two.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Two.

COUNT THIRTY-THREE: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Northland Investment Corporation; recklessness)

- 1-4. Paragraphs 1-4 of Count Thirteen are hereby realleged as paragraphs 1-4 of Count Thirty-Three.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Three.

COUNT THIRTY-FOUR: (Samuel Negron-Gonzalez ppa Ruben Negron as to Northland Investment Corporation; recklessness)

- 1-4. Paragraphs 1-4 of Count Fourteen are hereby realleged as paragraphs 1-4 of Count Thirty-Four.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Four.

COUNT THIRTY-FIVE: (Ruben Negron III ppa Ruben Negron as to Northland Investment Corporation; recklessness)

- 1-4. Paragraphs 1-4 of Count Fifteen are hereby realleged as paragraphs 1-4 of Count Thirty-Five.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Five.

COUNT THIRTY-SIX: (Ruben Negron as to Northland Fund II Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Sixteen are hereby realleged as paragraphs 1-4 of Count Thirty-Six.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Six.

COUNT THIRTY-SEVEN: (Luisa Negron as to Northland Fund II Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Seventeen are hereby realleged as paragraphs 1-4 of Count Thirty-Seven.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Seven.

COUNT THIRTY-EIGHT: (Yamil Alexander Negron-Gonzalez ppa Ruben Negron as to Northland Fund II Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Eighteen are hereby realleged as paragraphs 1-4 of Count Thirty-Eight.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Eight.

COUNT THIRTY-NINE: (Samuel Negron-Gonzalez ppa Ruben Negron as to Northland Fund II Limited Partnership; recklessness)

- 1-4. Paragraphs 1-4 of Count Nineteen are hereby realleged as paragraphs 1-4 of Count Thirty-Nine.
- 5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Thirty-Nine.

COUNT Forty: (Ruben Negron III ppa Ruben Negron as to Northland Fund II Limited Partnership; recklessness)

1-4. Paragraphs 1-4 of Count Twenty are hereby realleged as paragraphs 1-4 of Count Forty.

5-9. Paragraphs 5-9 of Count Twenty-One are hereby realleged as paragraphs 5-9 of Count Forty.

THE PLAINTIFFS:

BY:

Jonathan Perkins Perkins and Associates 30 Lucy Street

Woodbridge, CT 06525 Tel. No.: (203) 397-1293 Juris No.: 421154

RETURN DATE: JANUARY 3, 2017 : SUPERIOR COURT

RUBEN NEGRON, LUISA NEGRON, : J.D. OF NEW HAVEN YAMIL ALEXANDER NEGRON-GONZALEZ
PPA RUBEN NEGRON, SAMUEL NEGRON- : AT NEW HAVEN

GONZALEZ PPA RUBEN NEGRON AND RUBEN

NEGRON III PPA RUBEN NEGRON

CHURCH STREET NEW HAVEN LLC, CINQUE GREEN LIMITED PARTNERSHIP, NORTHLAND INVESTMENT CORPORATION AND NORTHLAND FUND II LIMITED PARTNERSHIP

PRAYER FOR RELIEF

The plaintiff claims:

- 1. Monetary damages;
- 2. Common law punitive damages under Counts 21 40; and
- 3. Such other and further relief as the court deems fair and equitable.

THE PLAINTIFFS

NOVEMBER 30, 2016

BY:

Jonathan Perkins
Perkins and Associates
30 Lucy Street
Woodbridge, CT 06525

Tel. No.: (203) 397-1293

Juris No.: 421154

RETURN DATE: JANUARY 3, 2017

SUPERIOR COURT

RUBEN NEGRON, LUISA NEGRON,

J.D. OF NEW HAVEN

YAMIL ALEXANDER NEGRON-GONZALEZ
PPA RUBEN NEGRON, SAMUEL NEGRON-:

AT NEW HAVEN

GONZALEZ PPA RUBEN NEGRON AND RUBEN NEGRON III PPA RUBEN NEGRON :

NOVEMBER 30, 2016

VS.

CHURCH STREET NEW HAVEN LLC, CINQUE GREEN LIMITED PARTNERSHIP, NORTHLAND INVESTMENT CORPORATION AND NORTHLAND FUND II LIMITED PARTNERSHIP

STATEMENT OF AMOUNT IN DEMAND

The amount, legal interest or property in demand is greater than \$15,000.00, exclusive of interest and costs.

THE PLAINTIFFS

BY:

Jonathan Perkins
Perkins and Associates

30 Lucy Street

Woodbridgé, CT 06525 Tel. No.: (203) 397-1293

Juris No.: 421154